

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

JUSTIN NEIL FLOCCHINI,

Plaintiff,

v.

COMMISSIONER OF SOCIAL  
SECURITY,

Defendant.

No. 1:24-cv-01246-EPG

STIPULATED MOTION AND ORDER FOR  
AN EXTENSION OF TIME TO RESPOND TO  
PLAINTIFF'S MOTION FOR SUMMARY  
JUDGMENT

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Defendant's time for responding to Plaintiff's Motion for Summary Judgment be extended thirty-two (32) days from Monday, April 21, 2025 to Friday, May 23, 2025. This is Defendant's first request for an extension. Counsel for Plaintiff has no objection to Defendant's request for an extension.

Good cause exists for this request. Defendant respectfully requests this additional time because Counsel for Defendant has and will be unable to devote the time required to complete its response. Counsel has multiple merit briefs currently due in district court cases over the next week. Counsel for Defendant was also out of office April 1-4. Given leave and competing workload requirements an extension until May 23, 2025 will provide the opportunity for the

undersigned Counsel for Defendant to prioritize completing the response to Plaintiff's Motion for Summary Judgment. The undersigned Counsel apologizes to the Court and Plaintiff's counsel for any inconvenience caused by this request and delay. All other dates in the Court's Scheduling Order shall be extended accordingly.

Respectfully submitted,

MICHELE BECKWITH  
Acting United States Attorney

DATE: April 11, 2025

By: s/ Oscar Gonzalez de Llano  
OSCAR GONZALEZ DE LLANO  
Special Assistant United States Attorney  
Attorneys for Defendant

Respectfully submitted,

DATE: April 11, 2025

By: s/ Jonathan Omar Pena  
Jonathan Omar Pena  
Pena and Bromberg, PC  
(\*as authorized by email)  
Attorney for Plaintiff

ORDER

Pursuant to the parties' stipulation, IT IS SO ORDERED that Defendant shall have an extension, up to and including May 23, 2025, to respond to Plaintiff's Motion for Summary Judgment.

IT IS SO ORDERED.

Dated: April 11, 2025

/s/ Eric P. Grogan  
UNITED STATES MAGISTRATE JUDGE